

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Verizon Wireless Petition Pursuant to
47 U.S.C. § 160 for Partial Forbearance
from the Commercial Mobile Radio Services
Number Portability Obligations

WT Docket No. 01-184

REPLY COMMENTS OF BELL SOUTH

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BellSouth Corporation, by counsel and on behalf of itself and its wholly owned subsidiaries (“BellSouth”), respectfully submits these replies to comments filed in response to Verizon Wireless’ Petition for Forbearance (“Verizon Forbearance Petition”).¹

I. INTRODUCTION AND SUMMARY

As the record clearly demonstrates, the implementation of wireless local number portability (“LNP”) is both a complex and expensive undertaking – not just for wireless carriers but for wireline carriers as well. Commenters including BellSouth have repeatedly detailed the technical difficulties associated with deploying this capability by the November 24, 2002 deadline and have pointed out the risk to the network of requiring the simultaneous implementation of wireless LNP and thousands-block number pooling.

As the wireless LNP deadline draws closer and carriers continue to take the steps necessary to implement this capability, the list of technical challenges and outstanding issues

¹ See *WTB Seeks Comment on Wireless LNP Forbearance Petition Filed by Verizon Wireless*, WT Docket No. 01-184, *Public Notice*, DA 01-1872 (rel. August 7, 2001).

continues to grow. Some of these issues – such as “rate center disparity” – have been left unresolved for more than four years and must be addressed before carriers – wireless and wireline – can move forward.

Moreover, the recent terrorist attacks on the United States have placed increased focus on protecting the safety of the American public and ensuring the reliability of the Public Switched Telephone Network (“PSTN”). Commissioner Michael J. Copps recently made the following statement:

. . . We must set about the task of prioritizing what we do and of allocating resources toward new ends.

First we need to identify which parts of our networks performed well and which require more work. We must work to repair the damage done to our infrastructure and then work to achieve redundancy and security in all those places where infrastructure is critical. We have already begun the effort of improving our CALEA systems so law enforcement and industry can work together; our E911 system so public safety and wireless providers can react even more effectively; and our preemption protocols so that the most important calls always go through.²

Thus, in addition to the existing regulatory requirements already placed on the telecommunications industry, further requirements may be necessary to ensure the security and redundancy of the PSTN. Accordingly, it is timely for the Commission to review the wireless LNP requirement by considering the costs and benefits associated with implementing this capability in today’s environment.

Given the complex nature of these issues and the impending deadline, if the Commission denies the forbearance request, it should, at a minimum, extend the implementation deadline for wireless LNP for 12 to 15 months beyond the November 24, 2002 deadline, and require wireless carriers to comply with the existing pooling deadline.

² “In Defense of the Public Interest,” Remarks of Commissioner Michael J. Copps, Federal Communications Bar Association, Washington, D.C. (Oct. 15, 2001).

II. THE RECORD OVERWHELMINGLY SUPPORTS RELIEF FROM MEETING THE NOVEMBER 2002 WIRELESS NUMBER PORTABILITY DEADLINE.

The record is replete with evidence demonstrating the necessity of some form of relief from meeting the wireless LNP requirement. Commenters have shown time and time again the following:

- (1) wireless LNP is not necessary to promote competition;³
- (2) wireless participation in pooling can be accomplished in the absence of full wireless LNP implementation;⁴
- (3) the simultaneous implementation of pooling and porting poses significant risks to the PSTN;⁵ and
- (4) relief from the November 2002 deadline will allow carriers to devote scarce resources to other regulatory mandates designed to have more of an immediate impact on the public (*e.g.*, E911, CALEA, TTY).⁶

In addition to this compelling evidence, the wireless industry has expressed its commitment to implementing number pooling to meet the November 2002 compliance date.⁷

Although it has been said many times before, it bears repeating: implementing LNP is a tremendous effort that must be accomplished without degrading service quality. The Commission recognized this fact when it granted CMRS carriers an extension to comply with the

³ See, *e.g.*, ALLTEL Communications, Inc. (“ALLTEL”) Comments at 2; AT&T Wireless Services, Inc. (“AT&T Wireless”) Comments at 9; Cellular Telecommunications and Internet Association (“CTIA”) Comments at 11-13; Cingular Wireless LLC (“Cingular”) Comments at 5-15; Sprint PCS Petition To Advance Reply Comments Date and To Adopt Expedited Decision-Making Process (“Sprint PCS Petition”) at 4; Verizon Forbearance Petition at 16-19.

⁴ See, *e.g.*, AT&T Wireless Comments at 11; Cingular Comments at 15; CTIA Comments at 7-8; Verizon Forbearance Petition at 9-13;

⁵ See, *e.g.*, ALLTEL Comments at 3; AT&T Wireless Comments at 11, 17-18; CTIA Comments at 10; Sprint PCS Petition at 3; Sprint PCS Reply at 6.

⁶ See, *e.g.*, ALLTEL Comments at 8-9; Sprint PCS Petition at 4-5, 6; Sprint PCS Comments at 2-3; Verizon Forbearance Petition at 24, 28.

⁷ See, *e.g.*, AT&T Wireless Comments at 2; Sprint PCS Petition at 1; Verizon Wireless Petition at 1, 4, 24-26.

number portability requirements.⁸ By granting temporary forbearance, the Commission recognized that allowing the CMRS industry additional time to overcome the technical challenges associated with providing wireless LNP would serve the public interest.⁹ Despite this previous extension, prior technical difficulties and even some new ones have surfaced. For example, as ALLTEL correctly points out:

[S]ignificant questions remain as to whether the Number Portability Administration Center (NPAC) system will be able to accommodate the increase in porting volume that will inevitably result from the inclusion of 110 million new subscribers into the system. The NPAC software that incorporates Efficient Data Representation (EDR) (NPAC Version 3.0), which allows the system to transmit blocks of port requests in a single transaction, is still being tested.¹⁰

Thus, it is unknown at this point exactly when the NPAC system will be fully operational and capable of handling wireless LNP. This type of uncertainty further supports the need for some form of relief and flexibility.

As the record demonstrates, the simultaneous implementation of wireless LNP and pooling adds an additional layer of complexity, because each of these capabilities has its own set of technical challenges and expenses. As a number of commenters have pointed out,¹¹ the Commission has wisely adopted phased or staggered approaches to implement new capabilities

⁸ See *Cellular Telecommunications Industry Association's Petition for Forbearance From Commercial Mobile Radio Services Number Portability Obligations*, WT Docket No. 98-229; *Telephone Number Portability*, CC Docket No. 95-116, *Memorandum Opinion and Order*, 14 FCC Rcd 3092 (1999) ("CMRS Number Portability Forbearance Order").

⁹ *Id.* at 3104, ¶ 25.

¹⁰ ALLTEL Comments at 4.

¹¹ See, e.g., AT&T Wireless Comments at 2-3; CTIA Comments at 14; Sprint Petition at 9-10.

in other contexts (*e.g.*, pooling¹² and wireline number portability¹³). In the absence of forbearance, BellSouth urges the Commission, at a minimum, to “decouple” pooling from porting. Clearly, some form of relief is necessary to serve the public interest.

III. THE COMMISSION SHOULD CONDUCT A COST-BENEFIT ANALYSIS TO DETERMINE WHETHER WIRELESS LNP IS NECESSARY IN TODAY’S ENVIRONMENT.

BellSouth agrees with Sprint PCS that any determination regarding the future of wireless LNP must take into account the costs of portability in addition to any purported benefits before moving forward.¹⁴ Sprint PCS recommends the following approach:

[I]n the event that the Commission believes the LNP regulatory mandate may still be warranted, it should conduct a cost-benefits analysis before proceeding. . . .
[I]f the Commission believes that LNP will provide benefits to consumers, it must: (1) articulate those benefits with precision, (2) quantify those benefits, and then (3) compare those benefits with the costs of implementing and operating LNP.¹⁵

The Commission should take note of the decision made by the Hong Kong Office of Telecommunications Authority to conduct a cost-benefit analysis as part of a wireless number portability feasibility study.¹⁶ Such a tool is an essential precursor to understanding the value of any regulatory requirement. As Verizon Wireless indicates, “[e]ven assuming some possible competitive benefit to a regulatory burden, that burden should not be continued or imposed

¹² *Numbering Resource Optimization*, CC Docket No. 99-200, *Report and Order and Further Notice of Proposed Rulemaking*, 15 FCC Rcd 7574, 7645-46, 7647, ¶¶ 159, 161 (2000).

¹³ *Telephone Number Portability*, CC Docket No. 95-116, *First Report and Order and Further Notice of Proposed Rulemaking*, 11 FC Rcd 8352, 8501 (Appendix F) (1996).

¹⁴ Sprint PCS Comments at 8.

¹⁵ Sprint PCS Comments at 11.

¹⁶ Association of Communications Enterprises (“ASCENT”) Opposition at 8.

unless the tangible benefits justify doing so.”¹⁷ The Commission has recognized the value of cost-benefit analyses in other contexts.¹⁸ Therefore, BellSouth urges the Commission to undertake a similar analysis today for wireless LNP.

As the record demonstrates, the costs associated with the implementation of wireless LNP are significant. Sprint PCS estimates that its recurring costs alone of operating in an LNP environment will be at least \$50 million annually¹⁹ and over \$35 million just to meet the November 2002 deadline.²⁰ Similarly, Cingular estimates that it will spend in excess of \$250 million over the next five years to implement portability.²¹ Such significant costs are not limited to the wireless industry. Cingular correctly points out that “wireline carriers will also incur direct costs due to the need to port to and from wireless systems, as well as perform database queries in order to complete calls to mobile subscribers.”²² Moreover, the costs incurred by wireline carriers to implement wireless LNP are above and beyond those incurred to deploy wireline LNP and must be factored into any cost-benefit equation. In addition, the Commission must not overlook opportunity costs. As Sprint PCS aptly points out, “significant opportunity costs . . . must be taken into consideration; [r]esources dedicated to LNP will undoubtedly detract

¹⁷ Verizon Forbearance Petition at 28-29.

¹⁸ See, e.g., *Numbering Resource Optimization*, CC Docket Nos. 99-200 and 96-98, *Second Report and Order, Order on Reconsideration, and Second Further Notice of Proposed Rulemaking*, 16 FCC Rcd 306, 368, ¶ 148 (2000) (seeking cost-benefit analysis for rate center consolidation); *Computer III Further Remand Proceedings: Bell Operating Company Provision of Enhanced Services*, 1998 Biennial Regulatory Review – *Review of Computer III and ONA Safeguards and Requirements*, CC Docket Nos. 95-20 and 98-10, *Further Notice of Proposed Rulemaking*, 13 FCC Rcd 6040, 6067-70, ¶¶ 43-47 (1998) (discussion of cost-benefit analysis of structural safeguards).

¹⁹ Sprint PCS Petition at 4; Sprint PCS Comments at 9.

²⁰ Sprint PCS Reply Comments at 3.

²¹ Cingular Comments at i, 3, 15-16.

²² Cingular Comments at 16.

from resources that could be used to enhance coverage, improve service and quality, and develop advanced services.”²³

BellSouth strongly believes that the Commission should conduct a cost-benefit analysis to determine the true value of wireless LNP to the public in today’s environment. There is too much at stake to dismiss the significant technical challenges and costs associated with deploying this capability to meet the November 24, 2002 deadline.

IV. THE COMMISSION MUST ADDRESS CERTAIN UNRESOLVED ISSUES SUCH AS RATE CENTER DISPARITY AND THE PORTING OF TYPE 1 WIRELESS NUMBERS BEFORE CARRIERS CAN IMPLEMENT WIRELESS LNP.

There are a number of outstanding issues that the Commission must address as a prerequisite to developing the technical standards and procedures necessary to implement wireless LNP. One of the most critical issues, referred to as “rate center disparity,” has been looming unresolved since 1997. This issue is described in a 1998 report prepared by the North American Numbering Council (“NANC”) as follows:

Differences exist between the local serving areas of wireless and wireline carriers. These differences impact Service Provider portability with respect to porting both to and from wireline and wireless service providers. These differences, resulting in an impact called ‘disparity’, exist with the current architecture, making it impossible for some wireless subscribers to port to wireline carriers. This disparity is based on the Architecture Task Force recommendations, which were subsequently adopted by the FCC in the Second Report and Order. In the Second Report and Order[,], the FCC recommended that the geographic scope of Service Provider portability be limited to the wireline-established rate centers due to technical limitations with proper rating. Also in the Second Report and Order[,], the FCC recognized these recommendations addressed wireline requirements and did not reflect wireless needs.²⁴

²³ Sprint PCS Comments at 10.

²⁴ North American Numbering Council, Local Number Portability Administration Working Group Report on Wireless Wireline Integration (May 8, 1998) (“NANC Report”) at § 3.1.1 (at 6-7); *see also* §§ 3.1.2 - 3.1.4 (at 7).

As background, in August 1997, the Commission directed NANC to develop technical standards and operational procedures to govern wireless LNP.²⁵ Specifically, the Commission directed NANC to consider issues such as “how to account for differences between service area boundaries for wireline versus wireless services.”²⁶ Rather than establishing standards and procedures as requested by the Commission, the Report detailed the inability of the Wireless and Wireline Integration Task Force (“Task Force”)²⁷ or the NANC to resolve whether the current wireline/wireless architecture disparity resulted in a lack of competitive parity. Indeed, as ALLTEL points out, “[a]lthough that report addressed many issues related to wireless-to-wireless porting, it did not reach consensus on ‘inter-species’ porting between wireless and wireline carriers. To date, significant standards for inter-species porting still do not exist.”²⁸

Because consensus could not be reached, the Task Force escalated the matter to the NANC, which, in turn, wisely escalated the issue to the Commission.²⁹ In a letter to the Commission, NANC stated as follows: “[T]his lack of symmetry . . . referred to as ‘rate center disparity’ . . . raises questions by some carriers about competitive neutrality. . . . If the Commission determines that the lack of parity is unacceptable for example on competitive grounds, substantially significant additional effort will be required on the part of the industry.”³⁰

²⁵ *Telephone Number Portability*, CC Docket 95-116, *Second Report and Order*, 12 FCC Rcd 12281, 12333, ¶¶ 91-92 (1997) (“*Telephone Number Portability Second Report and Order*”).

²⁶ *Id.*, ¶ 91.

²⁷ Wireless Wireline Integration Task Force, Rate Center Issue Position Paper, North American Numbering Council (Jan. 20, 1998).

²⁸ ALLTEL Comments at 5.

²⁹ Letter from Alan C. Hasselwander, Chairman, North American Numbering Council, to A. Richard Metzger, Jr., Chief, Common Carrier Bureau, FCC (dated March 12, 1998); Letter from Alan C. Hasselwander, Chairman, North American Numbering Council, to A. Richard Metzger, Jr., Chief, Common Carrier Bureau, FCC (dated April 14, 1998).

³⁰ Letter from Alan C. Hasselwander, Chairman, North American Numbering Council, to A. Richard Metzger, Jr., Chief, Common Carrier Bureau, FCC (dated April 14, 1998).

In June 1998, the Common Carrier Bureau solicited public comment on the NANC Report. A second Report was issued in 1999; however, it still did not resolve the issue.³¹ This second Report only noted that the rate center issue had been referred to the Commission for resolution.³²

Thus, a complete record has been sitting before the Commission since 1998; however, there has been no movement. It is now the responsibility of the Commission to address this issue once and for all. The NANC Report expressly states that “[t]he difference in porting capabilities between wireless and wireline service providers with the existing method/architecture *creates a significant competitive disadvantage to wireline service providers.*”³³ Because the Commission is obligated to ensure that all aspects of the implementation of number portability are done in a competitively neutral manner, it must address this issue now. Moreover, the Commission must ensure that resolution of this outstanding issue is consistent with its existing numbering administration policies. These policies strictly prohibit discriminating against a class of carriers. Long standing guidelines state that numbering administration should: (1) seek to facilitate entry into the communications marketplace by making numbering resources available on an efficient and timely basis; (2) not unduly favor or disadvantage any particular industry segment or group of consumers; and (3) not unduly favor one technology over another.³⁴ Rate center disparity clearly contradicts these Commission policies.

³¹ North American Numbering Council, Local Number Portability Administration Working Group, 2nd Report on Wireless Wireline Integration (June 10, 1999).

³² *Id.* at 6.1 (at 28).

³³ NANC Report at 42 (emphasis added).

³⁴ *Proposed 708 Relief Plan and 630 Numbering Plan Area Code by Ameritech – Illinois*, IAD File No. 94-102, *Declaratory Ruling and Order*, 10 FCC Rcd 4596, 4604, ¶ 18 (1995).

In sum, BellSouth urges the Commission to address this issue quickly and decisively. Rate center disparity must be deemed a priority since Commission guidance is a necessary precondition to developing the technical specifications and procedures necessary to implement wireless LNP. In the absence of such standards, carriers cannot proceed with the implementation of wireless LNP in a competitively neutral manner. Moreover, even when such standards are finally developed, wireless and wireline carriers will need additional time to implement those standards and modify their networks and systems to meet the required specifications. It is simply not feasible to accomplish all the following tasks within the time remaining: (1) the Commission must resolve the rate center issue; (2) standards and procedures for wireless LNP must be developed; (3) carriers must implement those specifications; and (3) carriers must deploy wireless LNP to meet the November 2002 deadline. There is just not enough time.

Carriers are planning now and incurring costs today to implement wireless LNP. However, outstanding issues are creating roadblocks. Resolving these issues too close to the deadline does not benefit any party and, in fact, would likely lead to multiple carrier requests for waivers or extensions of the compliance deadline. Such a result is a tremendous waste of resources and time.

Another outstanding issue that has received little attention thus far, but is nonetheless significant, is the porting of wireless telephone numbers that use a Type 1 interconnection. These numbers (referred to as Type 1 numbers) reside in the end office of a local exchange carrier ("LEC") and are assigned to a Type 1 wireless interconnection trunk group, which

connects the wireless carrier switch and the LEC's end office switch. All traffic terminating to Type 1 wireless numbers routes to the LEC Type 1 interconnection end office.³⁵

The porting of Type 1 numbers is a complex and time-consuming process that must be handled manually. Type 1 trunk groups involve complex translations, and porting individual telephone numbers from within the group requires manual dismantling and reassembly of the trunk group translations. The complexities associated with this process have only recently come to the forefront as carriers work toward implementing wireless LNP. Consequently, there has been little discussion to date about how carriers should handle the porting of Type 1 numbers.

BellSouth is currently working with the industry to consider and develop standards and procedures for handling Type 1 wireless ports. This process, however, will not occur over night. Time is needed to develop the necessary standards and procedures and implement them thereafter. This work cannot be accomplished by the November 2002 deadline.

V. CONCLUSION

The record clearly demonstrates that some form of relief from meeting the November 24, 2002 deadline to implement wireless LNP is warranted. Technical difficulties, cost constraints, and unresolved critical issues all show that carriers cannot satisfy their obligation to implement wireless LNP by November 2002. Moreover, a cost-benefit analysis is needed to determine whether wireless LNP is necessary in today's environment. In light of the foregoing, if the Commission denies the pending forbearance request, at the very least, it should: (1) extend the implementation deadline for wireless LNP for 12 to 15 months beyond the November 24, 2002 deadline and (2) require wireless carriers to meet the existing pooling deadline.

³⁵ With Type 2 wireless interconnection trunks, the numbers reside in the wireless carrier's

Respectfully submitted,

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CERTIFICATE OF SERVICE

I do hereby certify that I have this 22nd day of October 2001 served the following parties to this action with a copy of the foregoing **REPLY COMMENTS** by electronic filing and/or by placing a true and correct copy of the same in the United States Mail, postage prepaid, addressed to the parties listed on the attached service list.

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